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ROBERT HUNTER BIDEN

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA
18 WESTERN DIVISION

19 ROBERT HUNTER BIDEN, an
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**DECLARATION OF ZACHARY C.
HANSEN IN SUPPORT OF HIS
OPPOSITION TO DEFENDANT
PATRICK M. BYRNE'S MOTION
FOR SUMMARY JUDGMENT**

*[Memorandum of Points and Authorities
in Opposition and Response To
Defendant Patrick Byrne's Statement Of
Uncontroverted Facts In Support Of His
Motion For Summary Judgment Or, In
The Alternative, Summary Adjudication;
and Plaintiff's Separate Statement Of
Controverted Facts filed and served
concurrently herewith]*

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**DECLARATION OF ZACHARY C. HANSEN IN SUPPORT OF PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

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Date: November 25, 2024
Time: 1:30 P.M.
Place: Ctrm. 10A
Judge: Hon. Hon. Stephen V. Wilson

DECLARATION OF ZACHARY C. HANSEN

I, Zachary C. Hansen, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Opposition To Defendant Patrick M. Byrne’s (“Defendant”) Motion For Summary Judgment. If called as a witness, I would and could testify to the matters contained herein.

2. Attached hereto as **Exhibit “1”** is a true and correct copy of relevant pages from Defendant’s verified Further Responses to Plaintiff’s Requests for Admissions (Set One), dated September 19, 2024, which were served on Plaintiff’s counsel’s office by Defendant’s counsel of record.

3. Attached hereto as **Exhibit “2”** is a true and correct copy of Issue 1 of Capitol Times Magazine, which was published on June 27, 2023, which was obtained by Plaintiff’s counsel’s office from publicly available sources, and which was produced in discovery by Plaintiff and bates labeled as RHB00001-RHB00099. Furthermore, Defendant in his verified Further Responses to Plaintiff’s Requests for Admissions (Set One) to Nos. 1, 2, 8, 14, dated September 19, 2024 admitted that he made the statements about Plaintiff contained in that issue that are the subject of this Action.

4. Attached hereto as **Exhibit “3”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Telegram account dated March 20, 2022, and which was produced in discovery by Plaintiff and bates labeled as RHB00695.

5. Attached hereto as **Exhibit “4”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Telegram account dated April 7, 2022, and which was produced in discovery by Plaintiff and bates labeled as RHB00696.

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1 6. Attached hereto as **Exhibit “5”** is a true and correct copy of a screenshot
2 I obtained of Defendant’s post on his publicly available Telegram account dated
3 October 20, 2022, and which was produced in discovery by Plaintiff and bates labeled
4 as RHB00697.

5 7. Attached hereto as **Exhibit “6”** is a true and correct copy of a screenshot
6 I obtained of Defendant’s post on his publicly available Telegram account dated
7 December 12, 2022, and which was produced in discovery by Plaintiff and bates
8 labeled as RHB00698.

9 8. Attached hereto as **Exhibit “7”** is a true and correct copy of a screenshot
10 I obtained of Defendant’s post on his publicly available X (formerly known as
11 Twitter) account dated February 10, 2023, and which was produced in discovery by
12 Plaintiff and bates labeled as RHB00699.

13 9. Attached hereto as **Exhibit “8”** is a true and correct copy of a screenshot
14 I obtained of Defendant’s post on his publicly available X (formerly known as
15 Twitter) account dated February 12, 2023, including associated comments, and which
16 was produced in discovery by Plaintiff and bates labeled as RHB00700.

17 10. Attached hereto as **Exhibit “9”** is a true and correct copy of a screenshot
18 I obtained of Defendant’s post on his publicly available X (formerly known as
19 Twitter) account dated February 24, 2023, and which was produced in discovery by
20 Plaintiff and bates labeled as RHB00701.

21 11. Attached hereto as **Exhibit “10”** is a true and correct copy of a
22 screenshot I obtained of Defendant’s post on his publicly available X (formerly
23 known as Twitter) account dated March 17, 2023, including associated comments,
24 and which was produced in discovery by Plaintiff and bates labeled as RHB00702.

25 12. Attached hereto as **Exhibit “11”** is a true and correct copy of a
26 screenshot I obtained of Defendant’s post on his publicly available X (formerly
27 known as Twitter) account dated March 28, 2023, and which was produced in
28 discovery by Plaintiff and bates labeled as RHB00110.

1 13. Attached hereto as **Exhibit “12”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s post on his publicly available X (formerly
3 known as Twitter) account dated May 12, 2023, and which was produced in discovery
4 by Plaintiff and bates labeled as RHB00101.

5 14. Attached hereto as **Exhibit “13”** is a true and correct copy of a
6 screenshot I obtained of Defendant’s post on his publicly available Telegram account
7 dated June 24, 2023, and which was produced in discovery by Plaintiff and bates
8 labeled as RHB00703.

9 15. Attached hereto as **Exhibit “14”** is a true and correct copy of a
10 screenshot I obtained of a publicly available video file of the May 10, 2023 episode
11 of *The Absolute Truth with Emerald Robinson* with the caption “Patrick Byrne Drops
12 Bombshell Allegations Regarding Hunter Biden and Iran” from
13 [https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-allegations-regarding-](https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-allegations-regarding-hunter-biden-and-iran.html?e9s=rel_v1_b)
14 [hunter-biden-and-iran.html?e9s=rel_v1_b](https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-allegations-regarding-hunter-biden-and-iran.html?e9s=rel_v1_b), and which was produced in discovery by
15 Plaintiff and bates labeled as RHB00186.

16 16. Attached hereto as **Exhibit “15”** is a true and correct copy of a
17 screenshot I obtained of a publicly available video file of the May 11, 2023 episode
18 of *The Absolute Truth with Emerald Robinson* from [https://rumble.com/v2n9tpy-the-](https://rumble.com/v2n9tpy-the-absolute-truth-with-emerald-robinson-may-11-2023.html)
19 [absolute-truth-with-emerald-robinson-may-11-2023.html](https://rumble.com/v2n9tpy-the-absolute-truth-with-emerald-robinson-may-11-2023.html), and which was produced
20 in discovery by Plaintiff and bates labeled as RHB00187.

21 17. Attached hereto as **Exhibit “16”** are true and correct copies of relevant
22 portions of a transcript of the publicly available May 11, 2023 episode of *The Absolute*
23 *Truth with Emerald Robinson*, which was prepared at my direction by Plaintiff’s
24 counsel’s office, and which was produced in discovery by Plaintiff and bates labeled
25 as RHB00711-RHB00715. I have reviewed the transcript and listened to the
26 foregoing episode and confirm that the transcript is accurate.

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1 18. Attached hereto as **Exhibit “17”** are true and correct copies of multiple
2 screenshots I obtained of Defendant’s post on his publicly available X (formerly
3 known as Twitter) account dated May 12, 2023, including associated comments, and
4 which were produced in discovery by Plaintiff and bates labeled as RHB00102-
5 RHB00103, RHB00112-RHB00117.

6 19. Attached hereto as **Exhibit “18”** is a true and correct copy of a
7 screenshot I obtained of Defendant’s post on his publicly available Telegram account
8 dated June 27, 2023, and which was produced in discovery by Plaintiff and bates
9 labeled as RHB00152.

10 20. Attached hereto as **Exhibit “19”** is a true and correct copy of a
11 screenshot I obtained of Defendant’s post on his publicly available Telegram account
12 dated June 27, 2023, and which was produced in discovery by Plaintiff and bates
13 labeled as RHB00153.

14 21. Attached hereto as **Exhibit “20”** is a true and correct copy of a
15 screenshot I obtained of Defendant’s post on his publicly available Telegram account
16 dated June 28, 2023, and which was produced in discovery by Plaintiff and bates
17 labeled as RHB00157.

18 22. Attached hereto as **Exhibit “21”** are true and correct copies of multiple
19 screenshots I obtained of Defendant’s post on his publicly available X (formerly
20 known as Twitter) account dated June 29, 2023, including associated comments, and
21 which was produced in discovery by Plaintiff and bates labeled as RHB00105-
22 RHB00106.

23 23. Attached hereto as **Exhibit “22”** is a true and correct copy of a
24 screenshot I obtained of Defendant’s posts on his publicly available Telegram account
25 dated July 4, 2023, and which was produced in discovery by Plaintiff and bates
26 labeled as RHB00156.

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24. Attached hereto as **Exhibit “23”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 5, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00161.

25. Attached hereto as **Exhibit “24”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 6, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00162.

26. Attached hereto as **Exhibit “25”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 22, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00167.

27. Attached hereto as **Exhibit “26”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 28, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00168.

28. Attached hereto as **Exhibit “27”** is a true and correct copy of a screenshot I obtained of a publicly available video file of the July 21, 2023 episode of *The Alex Jones Show* from <https://rumble.com/v3236py-white-house-witness-patrick-byrne-friday-full-show-072123.html>, and which was produced in discovery by Plaintiff and bates labeled as RHB00185.

29. Attached hereto as **Exhibit “28”** are true and correct copies of relevant portions of a transcript of the publicly available July 21, 2023 episode of *The Alex Jones Show*, which was prepared at my direction by Plaintiff’s counsel’s office, and which was produced in discovery by Plaintiff and bates labeled as RHB00722, RHB00743-RHB00749, RHB00756, RHB00765-RHB00767, RHB00770. I have reviewed the transcript and listened to the foregoing episode and confirm that the transcript is accurate.

1 30. Attached hereto as **Exhibit “29”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s post on his publicly available Telegram account
3 dated July 21, 2023, and which was produced in discovery by Plaintiff and bates
4 labeled as RHB00164.

5 31. Attached hereto as **Exhibit “30”** is a true and correct copy of a
6 screenshot I obtained of a publicly available video file of the September 8, 2023
7 episode of *The Courtenay Turner Podcast* titled “Episode 305: Behind the Testimony
8 of ‘America’s #1 Domestic Extremist w/ Patrick Byrne” from
9 [https://courtenayturner.com/ep-305-behind-the-testimony-of-americas-1-domestic-](https://courtenayturner.com/ep-305-behind-the-testimony-of-americas-1-domestic-extremist-w-patrick-byrne/)
10 [extremist-w-patrick-byrne/](https://courtenayturner.com/ep-305-behind-the-testimony-of-americas-1-domestic-extremist-w-patrick-byrne/), and which was produced in discovery by Plaintiff and
11 bates labeled as RHB00184.

12 32. Attached hereto as **Exhibit “31”** are true and correct copies of relevant
13 portions of a transcript of the publicly available September 8, 2023 episode of *The*
14 *Courtenay Turner Podcast* titled “Episode 305: Behind the Testimony of ‘America’s
15 #1 Domestic Extremist w/ Patrick Byrne”, which was prepared at my direction by
16 Plaintiff’s counsel’s office, and which was produced in discovery by Plaintiff and
17 bates labeled as RHB00790-RHB00793, RHB00804-RHB00809, RHB00814,
18 RHB00817-RHB00818, RHB00846. I have reviewed the transcript and listened to
19 the foregoing episode and confirm that the transcript is accurate.

20 33. Attached hereto as **Exhibit “32”** is a true and correct copy of a
21 screenshot I obtained of Defendant’s post on his publicly available Telegram account
22 dated September 17, 2023, and which was produced in discovery by Plaintiff and
23 bates labeled as RHB00169.

24 34. Attached hereto as **Exhibit “33”** is a true and correct copy of a
25 screenshot I obtained of Defendant’s post on his publicly available X (formerly
26 known as Twitter) account dated October 8, 2023, and which was produced in
27 discovery by Plaintiff and bates labeled as RHB00147.

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1 35. Attached hereto as **Exhibit “34”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s post on his publicly available X (formerly
3 known as Twitter) account dated October 8, 2023, and which was produced in
4 discovery by Plaintiff and bates labeled as RHB00146.

5 36. Attached hereto as **Exhibit “35”** is a true and correct copy of a
6 screenshot I obtained of Defendant’s post on his publicly available X (formerly
7 known as Twitter) account dated October 17, 2023, including associated comments
8 and which was produced in discovery by Plaintiff and bates labeled as RHB00141.

9 37. Attached hereto as **Exhibit “36”** is a true and correct copy of a
10 screenshot I obtained of Defendant’s post on his publicly available X (formerly
11 known as Twitter) account dated October 17, 2023, and which was produced in
12 discovery by Plaintiff and bates labeled as RHB00148.

13 38. Attached hereto as **Exhibit “37”** are true and correct copies of multiple
14 screenshots I obtained of Defendant’s post on his publicly available X (formerly
15 known as Twitter) account dated November 9, 2023, including associated comments
16 and which were produced in discovery by Plaintiff and bates labeled as RHB00120,
17 RHB00123-RHB00124.

18 39. Attached hereto as **Exhibit “38”** is a true and correct copy of a
19 screenshot I obtained of a publicly available video file of the November 13, 2023
20 episode of *The StoneZONE with Roger Stone* with the caption “Sued by Hunter Biden
21 Former Overstock CEO Patrick Byrne Enters the StoneZone” from
22 [https://rumble.com/v3viewv-sued-by-hunter-biden-former-overstock-ceo-patrick-](https://rumble.com/v3viewv-sued-by-hunter-biden-former-overstock-ceo-patrick-byrne-joins-roger-stone-i.html)
23 [byrne-joins-roger-stone-i.html](https://rumble.com/v3viewv-sued-by-hunter-biden-former-overstock-ceo-patrick-byrne-joins-roger-stone-i.html), and which was produced in discovery by Plaintiff
24 and bates labeled as RHB00183.

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1 40. Attached hereto as **Exhibit “39”** are true and correct copies of relevant
2 portions of a transcript of the publicly available November 13, 2023 episode of *The*
3 *StoneZONE with Roger Stone*, which was prepared at my direction by Plaintiff’s
4 counsel’s office, and which was produced in discovery by Plaintiff and bates labeled
5 as RHB00847-RHB00864. I have reviewed the transcript and listened to the
6 foregoing episode and confirm that the transcript is accurate.

7 41. Attached hereto as **Exhibit “40”** are true and correct copies of multiple
8 screenshots I obtained of Defendant’s post on his publicly available X (formerly
9 known as Twitter) account dated November 13, 2023, including associated comments
10 and which were produced in discovery by Plaintiff and bates labeled as RHB00108,
11 RHB00131-RHB00132.

12 42. Attached hereto as **Exhibit “41”** is a true and correct copy of a
13 screenshot I obtained from Amazon.com of Defendant’s book “*Danger Close:*
14 *Domestic Extremist #1 Comes Clean*” for sale and which was produced in discovery
15 by Plaintiff and bates labeled as RHB00709. I purchased Defendant’s book “*Danger*
16 *Close: Domestic Extremist #1 Comes Clean*” from Amazon.com and can confirm
17 based on my personal review of this book, that the same defamatory statements that
18 Defendant published in the June 27, 2023 Capitol Times Magazine article about
19 Plaintiff, and which form the basis of this lawsuit, are also contained in Defendant’s
20 book “*Danger Close: Domestic Extremist #1 Comes Clean*”.

21 43. Attached hereto as **Exhibit “42”** is a true and correct copy of a
22 screenshot I obtained of Defendant’s post on his publicly available X (formerly
23 known as Twitter) account dated April 25, 2024, and which was produced in
24 discovery by Plaintiff and bates labeled as RHB00107.

25 44. Attached hereto as **Exhibit “43”** is a true and correct copy of a
26 screenshot I obtained of Defendant’s post on his publicly available Truth Social
27 account dated February 13, 2024, and which was produced in discovery by Plaintiff
28 and bates labeled as RHB00170.

1 45. Attached hereto as **Exhibit “44”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s post on his publicly available X Truth Social
3 account dated February 22, 2024, and which was produced in discovery by Plaintiff
4 and bates labeled as RHB00172.

5 46. Attached hereto as **Exhibit “45”** is a true and correct copy of a
6 screenshot I obtained of Defendant’s post on his publicly available Truth Social
7 account from 2024 (exact date unknown), and which was produced in discovery by
8 Plaintiff and bates labeled as RHB00174.

9 47. Attached hereto as **Exhibit “46”** is a true and correct copy of a
10 screenshot I obtained of Defendant’s post on his publicly available Truth Social
11 account from 2024 (exact date unknown), and which was produced in discovery by
12 Plaintiff and bates labeled as RHB00176.

13 48. Attached hereto as **Exhibit “47”** is a true and correct copy of a
14 screenshot I obtained of Defendant’s post on his publicly available Truth Social
15 account from 2024 (exact date unknown), and which was produced in discovery by
16 Plaintiff and bates labeled as RHB00177.

17 49. Attached hereto as **Exhibit “48”** is a true and correct copy of a
18 screenshot I obtained of Defendant’s post on his publicly available X (formerly
19 known as Twitter) account dated July 22, 2024, including associated comments and
20 which was produced in discovery by Plaintiff and bates labeled as RHB00138.

21 50. Attached hereto as **Exhibit “49”** is a true and correct copy of a
22 screenshot I obtained of Defendant’s post on his publicly available Telegram account
23 dated June 5, 2024, and which was produced in discovery by Plaintiff and bates
24 labeled as RHB00704.

25 51. Attached hereto as **Exhibit “50”** is a true and correct copy of a
26 screenshot I obtained of Defendant’s post on his publicly available Telegram account
27 dated October 7, 2024, and which was produced in discovery by Plaintiff and bates
28 labeled as RHB00705.

1 52. Attached hereto as **Exhibit “51”** is a true and correct copy of relevant
2 pages from Defendant’s verified Further Responses to Plaintiff’s Interrogatories (Set
3 One), dated August 6, 2024, which were served on Plaintiff’s counsel’s office by
4 Defendant’s counsel of record.

5 53. Attached hereto as **Exhibit “52”** is a true and correct copy of relevant
6 pages from Defendant’s Further Responses to Plaintiff’s Requests for the Production
7 of Documents (Set One), dated September 17, 2024, which were served on Plaintiff’s
8 counsel’s office by Defendant’s counsel of record.

9 54. Attached hereto as **Exhibit “53”** is a true and correct copy of a portion
10 of Defendant’s document production bates labeled “Byrne_000001-Byrne_000003”
11 that was served on Plaintiff’s counsel office by Defendant’s counsel of record, and
12 which Defendant claims is the signed and notarized Affidavit of John Moynihan dated
13 April 1, 2024. Because Defendant designated this exhibit as confidential under the
14 Protective Order (Dkt #63), this is being filed in redacted form in the version filed
15 with the Court’s ECF system, but an unredacted copy is being provided to the Court
16 via email and submission of the paper copy.

17 55. Attached hereto as **Exhibit “54”** is a true and correct copy of a transcript
18 prepared at my direction by Plaintiff’s counsel’s office of the audio recording
19 produced by Defendant in discovery titled “HIGHLY CONFIDENTIAL – AUDIO-
20 2021-08-15-10-07-25”. I have reviewed the transcript and listened to the foregoing
21 recording and confirm that the transcript is accurate. Because Defendant designated
22 this exhibit as confidential under the Protective Order (Dkt #63), this is being filed in
23 redacted form in the version filed with the Court’s ECF system, but an unredacted
24 copy is being provided to the Court via email and submission of the paper copy.

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1 56. Attached hereto as **Exhibit “55”** is a true and correct copy of a transcript
2 prepared at my direction by Plaintiff’s counsel’s office of the audio recording
3 produced by Defendant in discovery titled “HIGHLY CONFIDENTIAL – AUDIO-
4 2021-08-24-08-46-17”. I have reviewed the transcript and listened to the foregoing
5 recording and confirm that the transcript is accurate. Because Defendant designated
6 this exhibit as confidential under the Protective Order (Dkt #63), this is being filed in
7 redacted form in the version filed with the Court’s ECF system, but an unredacted
8 copy is being provided to the Court via email and submission of the paper copy.

9 57. Attached hereto as **Exhibit “56”** is a true and correct copy of a transcript
10 prepared at my direction by Plaintiff’s counsel’s office of the audio recording
11 produced by Defendant in discovery titled “HIGHLY CONFIDENTIAL – AUDIO-
12 2021-08-24-14-43-38”. I have reviewed the transcript and listened to the foregoing
13 recording and confirm that the transcript is accurate. Because Defendant designated
14 this exhibit as confidential under the Protective Order (Dkt #63), this is being filed in
15 redacted form in the version filed with the Court’s ECF system, but an unredacted
16 copy is being provided to the Court via email and submission of the paper copy.

17 58. Attached hereto as **Exhibit “57”** is a true and correct copy of relevant
18 portions of the Confidential certified transcript of Plaintiff’s deposition that occurred
19 on August 16, 2024. Because Defendant designated this exhibit as confidential under
20 the Protective Order (Dkt #63), this is being filed in redacted form in the version filed
21 with the Court’s ECF system, but an unredacted copy is being provided to the Court
22 via email and submission of the paper copy.

23 59. Attached hereto as **Exhibit “58”** is a true and correct copy of a
24 screenshot I obtained from Amazon.com of Defendant’s book “*The Deep Rig: How*
25 *Election Fraud Cost Donald J. Trump the White House, By a Man Who did not Vote*
26 *for Him: (or what to send friends who ask, “Why do you doubt the integrity of the*
27 *Election 2020?”)*” for sale and which was produced in discovery by Plaintiff and bates
28 labeled as RHB00710.

1 60. Attached hereto as **Exhibit “59”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s post on his publicly available X (formerly
3 known as Twitter) account dated April 17, 2023, and which was produced in
4 discovery by Plaintiff and bates labeled as RHB00716.

5 61. Attached hereto as **Exhibit “60”** is a true and correct copy of a
6 screenshot I obtained of Defendant’s post on his publicly available X (formerly
7 known as Twitter) account dated April 8, 2024, and which was produced in discovery
8 by Plaintiff and bates labeled as RHB00717.

9 62. Attached hereto as **Exhibit “61”** is a true and correct copy of a
10 screenshot I obtained of Defendant’s post on his publicly available X (formerly
11 known as Twitter) account dated January 5, 2023, and which was produced in
12 discovery by Plaintiff and bates labeled as RHB00718.

13 63. Attached hereto as **Exhibit “62”** is a true and correct copy of a
14 screenshot I obtained of Defendant’s post on his publicly available X (formerly
15 known as Twitter) account dated June 25, 2023, and which was produced in discovery
16 by Plaintiff and bates labeled as RHB00719.

17 64. Attached hereto as **Exhibit “63”** is a true and correct copy of a
18 screenshot I obtained of Defendant’s post on his publicly available X (formerly
19 known as Twitter) account dated May 10, 2023, and which was produced in discovery
20 by Plaintiff and bates labeled as RHB00720.

21 65. Attached hereto as **Exhibit “64”** is a true and correct copy of a
22 screenshot I obtained of Defendant’s post on his publicly available X (formerly
23 known as Twitter) account dated January 7, 2023, and which was produced in
24 discovery by Plaintiff and bates labeled as RHB00721.

25 66. Attached hereto as **Exhibit “65”** is a true and correct copy of a
26 screenshot I obtained of Defendant’s post on his publicly available X (formerly
27 known as Twitter) account dated October 26, 2024, and which was produced in
28 discovery by Plaintiff and bates labeled as RHB00706.

1 67. Attached hereto as **Exhibit “66”** is a true and correct copy of a
2 screenshot I obtained of Defendant’s publicly available X (formerly known as
3 Twitter) account on October 30, 2024, and which was produced in discovery by
4 Plaintiff and bates labeled as RHB00707.

5 68. Attached hereto as **Exhibit “67”** is a true and correct copy of a
6 screenshot I obtained of the website <https://enemywithindocuseries.com/> which
7 advertises Defendant’s mini-series “The Enemy Within”, and which was produced
8 in discovery by Plaintiff and bates labeled as RHB00708.

9 69. Attached hereto as **Exhibit “68”** is a true and correct copy of an email
10 chain between Defendant’s counsel of record and myself, with Plaintiff’s other
11 counsel of record copied thereon, between September 6, 2024 and September 11,
12 2024. In this email chain, my meet and confer discussions with Defendant’s counsel
13 of record regarding the scheduling of Defendant’s deposition and the location are set
14 forth. This includes a detailed summary of my meet and confer conference call with
15 Defendant’s counsel of record, Michael Murphy, on September 2, 2024, in which he
16 offered to find a location for Defendant’s deposition to take place in Florida, USA.
17 Then on September 11, 2024, when Defendant’s attorney of record stated any in-
18 person deposition of Defendant would have to be in Dubai or via zoom from Dubai,
19 which Plaintiff had an issue with because of the time it takes to travel to Dubai and,
20 upon legal research, the legality of a deposition in Dubai and lack of legal authority
21 authorizing a deposition to occur in Dubai for use in a District Court case in the United
22 States. Since September 11, 2024, the scheduling of Defendant’s deposition and the
23 location thereof has been the subject of two different Informal Discovery Conferences
24 on September 18, 2024, and October 4, 2024. (See Docket #67, 79.) This issue was
25 also the subject of a discovery motion that was filed on October 9, 2024, and which
26 the Court ruled on October 30, 2024, that Defendant would be required to return to
27 the United States for his deposition before trial and was required to inform Plaintiff’s
28 counsel by November 4, 2024, what federal district he will choose to appear for his

1 deposition in. (See Docket #87.) Defendant's deposition has not yet occurred due to
2 the foregoing discovery disputes.

3 70. In discovery motions in this litigation, Defendant gave wild and differing
4 claims about why he was residing in Dubai. First, Defendant's counsel said he was
5 informed by an unidentified DEA agent that the Venezuelan government placed a \$25
6 million bounty on him and he did not want to return to the United States due to safety
7 issues. (See Docket #67.) Then Defendant claimed in a declaration that he was in
8 Ghana cooperating with an official with the Ghanaian Ministry of Security who
9 informed Defendant that criminals in West Africa were cooperating to get him in a
10 position where he could be kidnapped. (See Docket #76.)

11 71. Attached hereto as **Exhibit "69"** is a true and correct copy of an email
12 that Defendant's counsel of record, Michael Murphy, sent to me on August 17, 2024.

13 72. Attached hereto as **Exhibit "70"** is a true and correct copy of an email
14 that Defendant's counsel of record, Michael Murphy, sent to me on September 30,
15 2024.

16 I declare under penalty of perjury under the laws of the United States of
17 America that the foregoing is true and correct. Executed on this 4th day of November,
18 2024, at Summit, New Jersey.

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20
21 /s/ Zachary C. Hansen
22 Zachary C. Hansen
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